



Getty Oil Company

P.O. Box 7900, Salt Lake City, Utah 84107 • Telephone (801) 263-3850

April 13, 1982

Mr. Jay B. Pitkin  
Assistant Director  
Bureau of Water Pollution  
P.O. Box 2500  
Salt Lake City, Utah 84110

RE: Construction Permit  
Reservation Canyon Tailings Pond  
Mercur, Utah

RECEIVED  
APR 26 1982

DIVISION OF  
OIL, GAS & MINING

Dear Mr. Pitkin:

This letter amendment to our application for a Permit to Construct the Reservation Canyon tailings facility at Mercur reflects your comments and the consensus opinion of the attendees as shown in our minutes of our April 12, 1982 meeting. At that meeting, representatives from Getty, Dames and Moore, and Davy McKee met with you and your staff to discuss Getty's response to Mr. Sudweeks letter of April 8, 1982. In that letter, the Bureau requested positive seepage control to a greater degree than was proposed in our permit application in order to reduce seepage even further than that possible by utilizing tailings alone. Our amended commitments follow.

Getty Mining Company will provide under all areas of tailings deposition positive seepage control which limits effective permeability to less than or equal to  $1 \times 10^{-7}$  cm/sec. This permeability standard is consistent with studies and guidelines endorsed by the Environmental Protection Agency and the Nuclear Regulatory Commission. Seepage control over areas of permeable rock or soil will be by an impervious liner of compacted local clay. Where a clay liner is placed over permeable materials, it will compact in lifts of eight to twelve inch thickness to a minimum of 90 percent of the maximum dry density as determined by the ASTM D-1557 (AASHTO T-180) Method of Compaction. The moisture content of the liner material will be adjusted to between optimum and three percent greater than optimum prior to compaction. At least two lifts will be placed. Over areas of impermeable Manning Canyon Shale the lining will be modified to consist of scarification and compaction of the in-situ clay in one lift. In any case, a limiting effective seepage control permeability of not more than  $1 \times 10^{-7}$  cm/sec will be provided under all areas prior to depositing tailings on those areas.

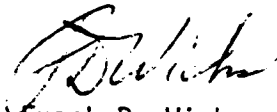
Getty Mining Company requests that the Bureau provide in it's Permit to Construct a mechanism for allowing future relief from the above proposed seepage control if the tailings effluent free cyanide concentration, as discharged to the tailings facility, is lowered to an acceptable level.

This acceptable free cyanide level should be determined in the future by taking into account all relevant technical data available at that time.

Getty Mining Company will modify the existing impoundment area topography and deposit tailings in manners other than described in the "Application for Permit to Construct the Reservation Canyon Tailings Site" submitted previously. This information should not be required by the Bureau to approve the Permit to Construct but will be made available to the Bureau as soon as it is developed.

We believe that this letter accurately reflects what Getty and the Bureau mutually agreed to at our April 12, 1982 meeting and we submit this as an amendment to our existing application. Your expediting the review and eventual approval of our application will be greatly appreciated. Thank you for your priority attention in setting up the meeting.

Very truly yours,



Frank D. Wicks  
Project Manager

FW/BB/dw